IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA RICHMOND DIVISION

ARTURO ESPARZA MACIAS, et	al.	
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Plaintiffs,

v.

MONTERREY CONCRETE, LLC, and JOSE DE LA ROSA,

Defendants.

Case No. 3:19-cv-00830-REP

DECLARATION OF MANUEL GAGO

- My name is Manuel Gago and I am a member of the Legal Aid Justice Center's
 ("LAJC") Immigrant Advocacy Program with the Farmworker Unit in Virginia. I have
 worked at Legal Aid Justice Center for two years.
- 2. I am fluent in both English and Spanish.
- As part of my work for LAJC, I have regularly communicated with plaintiffs in this
 action for purposes of assisting counsel for plaintiffs in, among other things, assembling
 required information and documents.
- 4. I am providing this Declaration to provide the Court with information and documents I have gathered showing that to the best of my information and belief the following nine plaintiffs (the "Mexico Located Plaintiffs") are presently in Mexico: Victor de los Reyes Rabanales, Cesar Ivan Esparza Aguilar, Uriel Cisneros, Leopoldo Gonzales, Jaime Marquez Esparza, Manuel Marquez Esparza, Reuel Eugenio Villagrana Canales, Luis Carlos Romero, and Alonso Cisneros Ayala.

- 5. Within the past week (between September 19 and 22), I collected location information from each Mexico Located Plaintiff using global positioning technology available on his cellular telephone, at the cell phone number that I have used to contact that plaintiff (with the exception of Reuel Eugenio Villagrana Canales provided me with a cellphone screenshot of his location). At my request, each Mexico Located Plaintiff has also provided a photograph of himself in Mexico with a local newspaper bearing a recent date. The output from the global position technology and the photographs are attached to this Declaration as Attachments A through R, as described in the following nine paragraphs. In addition, I asked each of these plaintiffs when they last returned to Mexico, and the information they provided me is also summarized below.
- 6. Per the global positioning system confirmation of his cell phone location as shown on Attachment A, Victor De Los Reyes Rabanales is located in Tapachula, Chiapas, Mexico. A photograph of him with a recent Mexican newspaper is Attachment B. He stated to me that he last traveled from the United States to Mexico in May 2018.
- 7. Per the global positioning system confirmation of his cell phone location as shown on Attachment C, Cesar Ivan Esparza Aguilar is located in Rio Grande, Zacatecas, Mexico. A photograph of him with a recent Mexican newspaper is Attachment D. He stated to me that he last traveled from the United States to Mexico in December 2019.
- 8. Per the global positioning system confirmation of his cell phone location as shown on Attachment E, Uriel Cisneros is located in Rio Grande, Zacatecas, Mexico. A photograph of him with a recent Mexican newspaper is Attachment F. He stated to me that he last traveled from the United States to Mexico in November 2016.

- 9. Per the global positioning system confirmation of his cell phone location as shown on Attachment G, Leopoldo Gonzales, is located in Rio Grande, Zacatecas, Mexico. A photograph of him with a recent Mexican newspaper is Attachment H. He stated to me that he last traveled from the United States to Mexico in November 2016.
- 10. Per the global positioning system confirmation of his cell phone location as shown on Attachment I, Jaime Marquez Esparza, is located in Rio Grande, Zacatecas, Mexico. A photograph of him with a recent Mexican newspaper is Attachment J. He stated to me that he last traveled from the United States to Mexico in December 2019.
- 11. Per the global positioning system confirmation of his cell phone location as shown on Attachment K, Manuel Marquez Esparza, is located in Rio Grande, Zacatecas, Mexico.

 A photograph of him with a recent Mexican newspaper is Attachment L. He stated to me that he last traveled from the United States to Mexico in December 2019.
- 12. Per the cell phone location screenshot that he provided me as shown on Attachment M, Reuel Eugenio Villagrana Canales is located in Rio Grande, Zacatecas, Mexico. A photograph of him with a recent Mexican newspaper is Attachment N. He stated to me that he last traveled from the United States to Mexico in December 2019.
- 13. Per the global positioning system confirmation of his cell phone location as shown on Attachment O, Luis Carlos Romero is located in Guadalupe, Nuevo León, Mexico. A photograph of him with a recent Mexican newspaper is Attachment P. He stated to me that he last traveled from the United States to Mexico in November 2019.

14. Per the global positioning system confirmation of his cell phone location as shown on Attachment Q, Alonso Cisneros Ayala is located in Rio Grande, Zacatecas, Mexico. A photograph of him with a recent Mexican newspaper is Attachment R. He stated to me that he last traveled from the United States to Mexico in August 2017.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on September 23, 2020.

Mad Zon

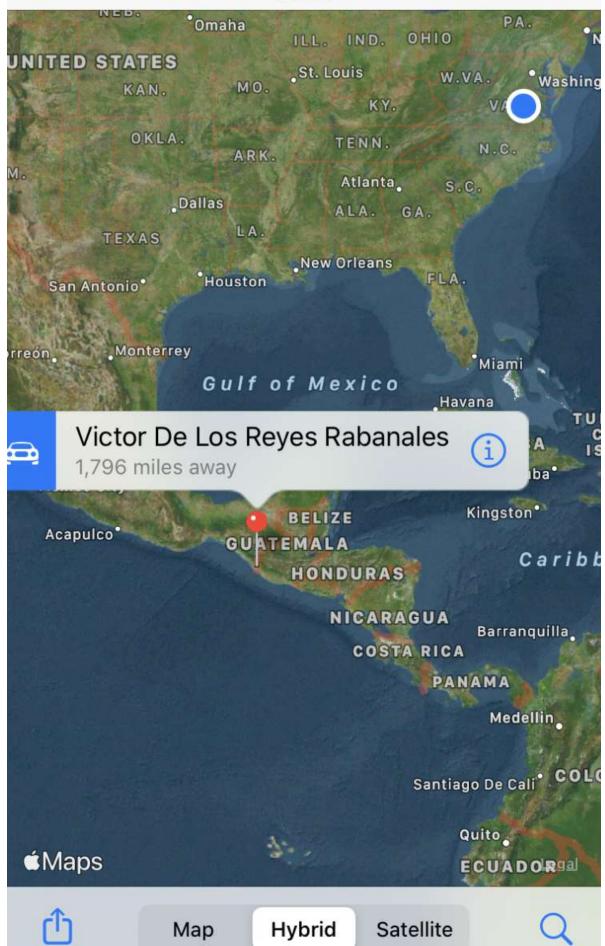
Manuel Gago

ATTACHMENT A

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30868 Tuxtla Chico, CHIS

Mexico



ATTACHMENT B

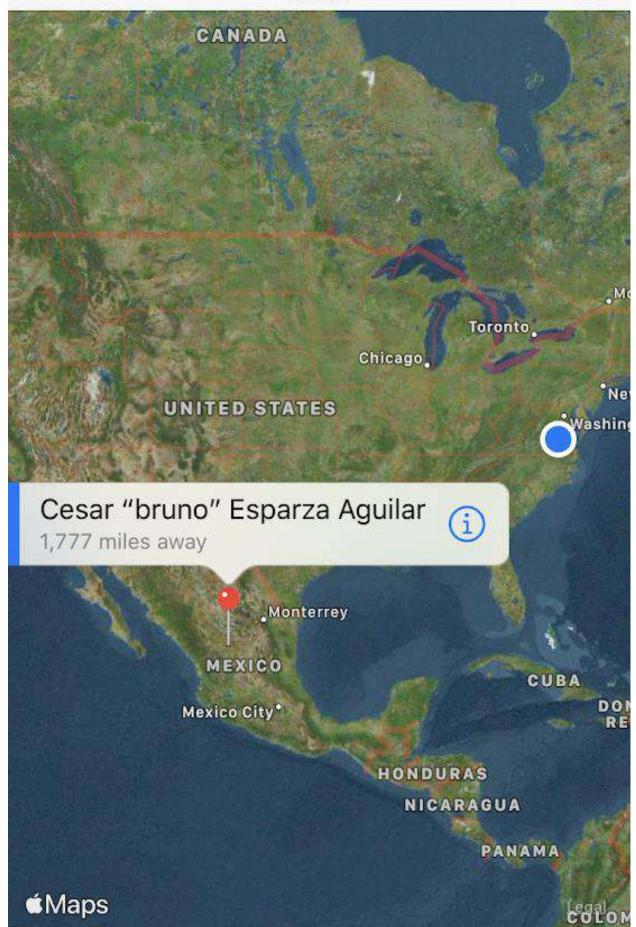


ATTACHMENT C



98406 Loreto, ZAC

Mexico

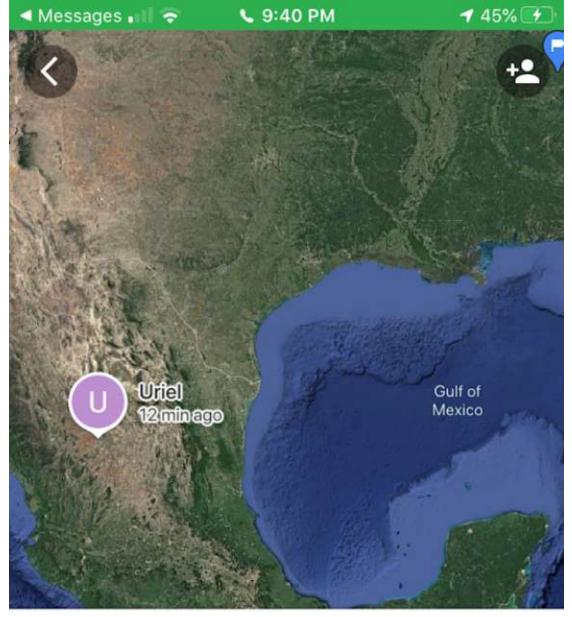


ATTACHMENT D



ATTACHMENT E

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Uriel Cisneros

1,777 mi away · 11 min ago

Río Grande, Zacatecas, Mexico



Local time Thu, 8:39 PM GMT-5

Share location with Uriel Cisneros

ATTACHMENT F



ATTACHMENT G



ATTACHMENT H







BACATECAS I DOMINGO 20 DE SEPTIEMBRE DE 2020 I AÑO LVI I NO 19.952 I ORGANIZACIÓN EDITORIAL MEXICANA

EL DE AYER, FUE UN SÁBADO VIOLENTO

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con el avertico de 5 personas. 2 elemenan de la proces municipal de Juan Alda-

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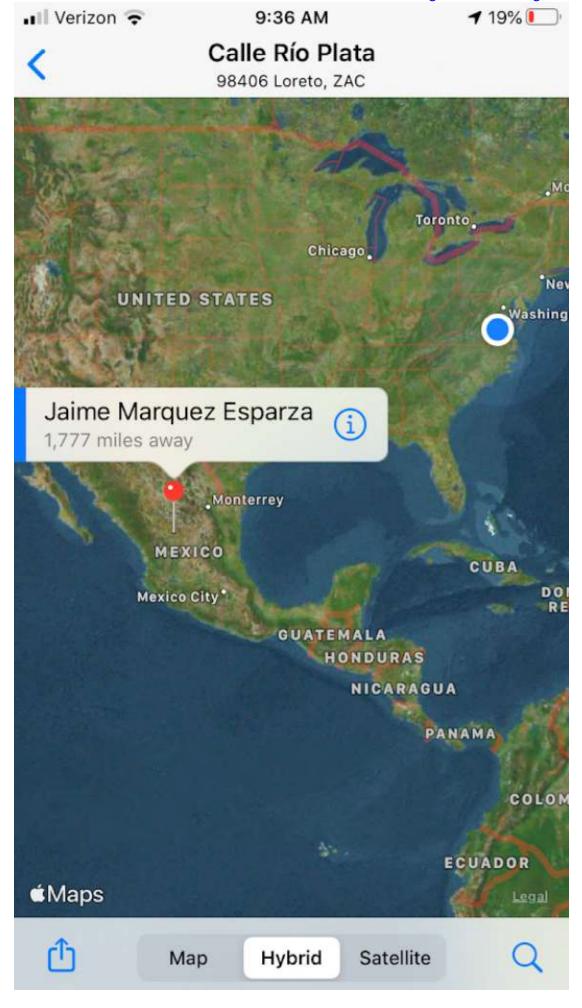
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MAPEAN VÍA SATÉLITE AL CRIMEN

Entre el 1 de septiembre del año pasado y el 30 de junio pasado, el Sistema Nacional de inteligencia de la cuatrote recutecció 48 imágenes satelitales de muy alta resolución en Guanajuato, falisco. Quintana Roo. Sonora, Vucatan y la Sonda de Campeche. en particular las plataformas petroleras, para identificar pistas etandestinas. ranches, campamentos de correnamiento de la definiciencia organizada, el rebo-

ATTACHMENT I



ATTACHMENT J

Case 3:19-cv-00830-REP Document 58-5 Filed 09/24/20 Page 24 of 40 PageID# 952 La voz Fiesta (C) arrasadora ¡Se soltaron Centinela

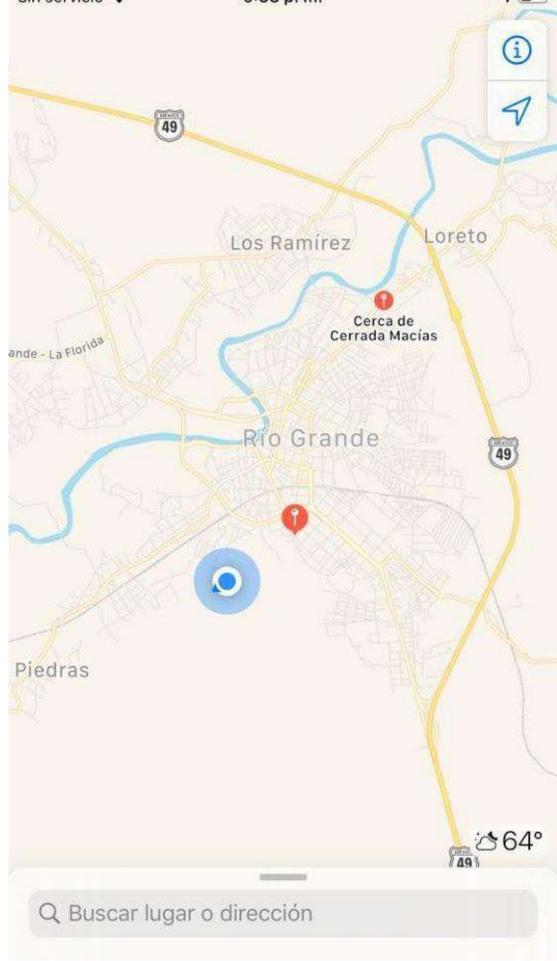
ATTACHMENT K



ATTACHMENT L



ATTACHMENT M



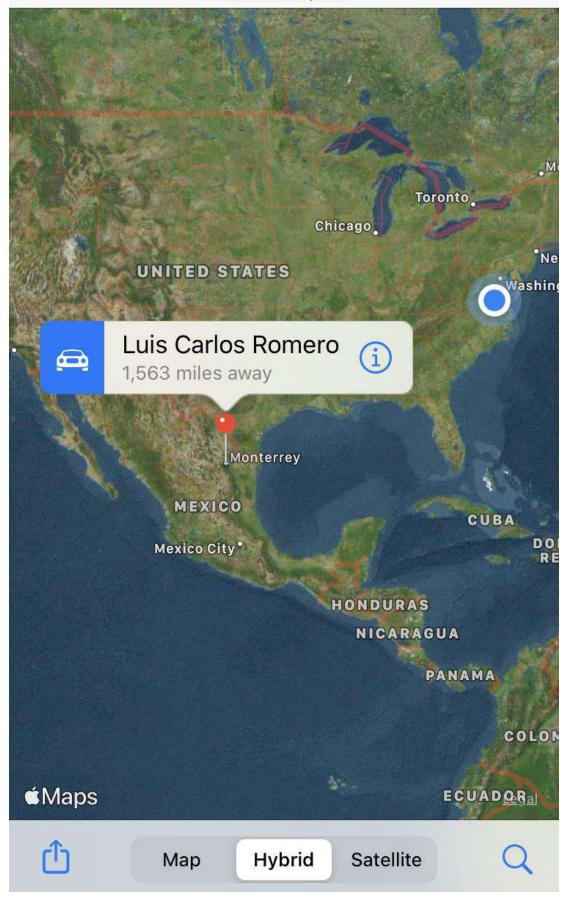
ATTACHMENT N



ATTACHMENT O



Vivienda Popular



ATTACHMENT P



ATTACHMENT Q



ATTACHMENT R

